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6 *Attorneys for Barbara Cegavske*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 FIGHT FOR NEVADA,

11 Plaintiffs,

12 vs.

13 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State,

14 Defendants.  
15

Case No. 2:20-cv-00837-RFB-EJY

**DECLARATION OF  
WAYNE THORLEY**

16  
17 I, WAYNE THORLEY, declare as follows:

18 I am the Deputy of Elections for the Nevada Secretary of State. I was appointed to  
19 the position of Deputy of Elections pursuant to NRS 225.060(1), and I have held the  
20 position since October 21, 2015. I have personal knowledge of the matters set forth below,  
21 and if called upon to testify in the above-captioned matter, I would testify as follows:

22 1. The notice of intent to recall required pursuant to NRS 306.015 was filed on  
23 February 14, 2020. A copy of the notice of intent is attached.

24 2. Article 2, Section 9 of the Nevada Constitution requires recall petitions to  
25 include signatures from at least 25 percent of the voters who actually voted in the election  
26 at which the public officer was elected. At the 2018 general election, there were 975,980  
27 votes cast statewide. This means 243,995 valid signatures are required to trigger a recall  
28 election.




**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 12th day of May, 2020, I filed with this Court's CM/ECF electronic filing system, **DECLARATION OF WAYNE THORLEY**, and served by this Court's electronic notification system to the addresses listed below:

Robert E. Barnes, Esq.  
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An employee of the Office  
of the Attorney General